UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA-NEWPORT NEWS DIVISION

MALIK JONES) JURY TRIAL DEMANDED
Plaintiff,)
)
v.) Case No.
)
CREDIT CONTORL CORPORATION,)
LLC.,)
Defendant.)
)

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory damages brought by the Plaintiff Malik Jones, an individual consumer, against Defendants, Credit Control Corporation, LLC., ("CCC") for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 et seq. (hereinafter "FDCPA"), Which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331.
Venue in this District is proper in that the Defendants transact business in Hampton, Hampton City, Virginia, and the conduct complained of occurred in Hampton, Hampton City, Virginia.

III. PARTIES

- 3. Plaintiff Malik Jones (hereinafter "Mr. Jones") is a natural person residing in Newport News, Warrick County, Virginia. Mr. Jones is a consumer as defined by the Fair Debt Collection Act, 15 U.S.C §1692a(3). Mr. Jones has been assigned 100 percent of these claims(s) above from Taneaka Robinson.
- Upon information and belief, Defendant Credit Control Corporation,
 LLC., is a Virginia corporation with its principal place of business located
 at 11821 Rock Landing Dr., Newport News VA, 23606.
- 5. Defendant Credit Control Corporation, LLC., is engaged in the collection of debt from consumers using the mail and telephone. Defendants regularly attempt to collect consumers' debts alleged to be due to another's.

IV. FACTS OF THE COMPLAINT

- Defendant Credit Control Corporation., (hereinafter referred to as "Debt Collector") is a "debt collector" as defined by the FDCPA, 15 U.S.C 1692a(6).
- 7. Around December 1, 2021 Mrs. Robinson checked her credit reports through "credit karma."
- 8. On the report, Mrs. Robinson observed multiple tradelines from Debt Collector.
- Debt Collector (Credit Control Corporation.,) furnished a trade line of \$247, allegedly owned to Riverside Regional
- 10. Also on December 1, 2021, Mrs. Robinson made a dispute via telephone, however on February 1, 2022. Mrs. Robinson re-checked her reports and Debt Collector had several communications with the consumer reporting agencies and Debt Collector failed to communicate that the debt was disputed by Mrs. Robinson.
- 11. Debt Collector's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Mrs. Robinson and caused sever humiliation, emotional distress, mental anguish, and damages to her FICO scores.

V. FIRST CLAIM FOR RELIEF (Defendant Credit Control Corporation.,) 15 U.S.C. §1692e(8)

- Mr. Jones, re-alleges and reincorporates all previous paragroups as if fully set out herein.
- 13. The Debt Collector violated the FDCPA.
- 14. The Debt Collectors violations include, but are not limited to the following:
 - (a) The Debt Collector violated 15 U.S.C § 1692e(8) of the FDCPA by failing to disclose to the consumer reporting agencies that the alleged debt was in dispute by Mrs. Robinson.
- 15. As a result of the above violations of the FDCPA, the defendants are liable to the Mr. Jones actual damages, statutory damages, and cost.

VI.JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff Mr. Jones respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against the Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(a)(1);
- C. Statutory damages pursuant to 15 U.S.C 1692k(2)(A);

- D. Cost pursuant to 15 U.S.C § 1692k(3);
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted:

Malik Jones

Malik Jones

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Newport News, VA 23608

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRIGINIA NEW DIVISION

Malik Jones Plainti	ff(s),
V.	Civil Action Number:
Credit Control Corpo	ration dant(s).
LOCAI	RULE 83.1(M) CERTIFICATION
I declare under penalty of perjury th	
No attorney has prepared, or assiste	d in the preparation of COMPlaint web Dewove for Jan (Title of Document)
Name of Pro Se Party (Print or Type)	TYICL
Signature of Pro Se Party	
Executed on: <u>415/22</u> (I	Date)
	OR
The following attorney(s) prepared of	or assisted me in preparation of (Title of Document)
(Name of Attorney)	
(Address of Attorney)	
(Telephone Number of Attorney) Prepared, or assisted in the preparation of,	this document
(Name of <i>Pro Se</i> Party (Print or Type)	
Signature of Pro Se Party	

(Date)

Executed on: _____